

**FAEGRE DRINKER BIDDLE & REATH LLP**

Rita Mansuryan (CA Bar No. 323034)  
*rita.mansuryan@faegredrinker.com*  
1800 Century Park East, Suite 1500  
Los Angeles, California 90067  
Telephone: (310) 203-4000  
Facsimile: (310) 229 1285

Sarah L. Brew (*pro hac vice forthcoming*)  
*sarah.brew@faegredrinker.com*  
Tyler A. Young (*pro hac vice forthcoming*)  
*tyler.young@faegredrinker.com*  
Rory F. Collins (*pro hac vice forthcoming*)  
*rory.collins@faegredrinker.com*  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600

*Counsel for Defendant*  
McDonald's Corporation

*[Additional Counsel list on next page]*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Eugina Harris, individually, and on behalf  
of all those similarly situated,

Plaintiff,

v.

McDonald's Corporation,

Defendant.

Case No. 3:20-cv-06533-LB

Assigned to Magistrate Judge Laurel Beeler

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND INITIAL  
DEADLINES AND CONTINUE CASE  
MANAGEMENT CONFERENCE**

1 **BORISON FIRM, LLC**  
2 Scott C. Borison (State Bar No. 289456)  
3 *scott@borisonfirm.com*  
4 1900 S. Norfolk St Ste 350  
San Mateo CA 94403  
Telephone: (301) 620-1016  
Facsimile: (301) 620-1018

5 **SHEEHAN & ASSOCIATES, P.C.**  
6 Spencer Sheehan (Pro Hac Vice)  
7 *spencer@spencersheehan.com*  
8 60 Cuttermill Rd Ste 409  
Great Neck, NY 11021  
Telephone: (516) 303-0552  
Facsimile: (516) 234-7800

9 *Counsel for Plaintiff and the Proposed Class*  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Pursuant to L.R. 6-2 and 7-12 Plaintiff Eugina Harris (“Plaintiff”) and Defendant McDonald’s Corporation (“Defendant,” and together with Plaintiff, the “Parties”) respectfully stipulate and jointly move the Court to extend the initial case deadlines and continue the Initial Case Management Conference by four weeks, as explained below.

1. On September 17, 2020, Plaintiff initiated this action by filing the Complaint. (*See* Dkt. No. 1.)

2. On September 18, 2020, the Court issued an order scheduling the Initial Case Management Conference for December 17, 2020, at 11:00 AM and setting deadlines for the parties to meet and confer and file a Rule 26(f) report. (*See* Dkt. No. 4.)

3. On October 15, 2020, Plaintiff served the Complaint and Summons on Defendant via its registered agent. (*See* Dkt. No. 9.) Declaration of Rita Mansuryan (“Mansuryan Decl.”), ¶ 3.

4. Under Rule 12(a)(1)(A)(i), Defendant’s response to the Complaint currently is due November 5, 2020. *Id.*, ¶ 4.

5. Defendant requires additional time to investigate the legal and factual basis of the claims and prepare a response to the Complaint. *Id.*, ¶ 5.

6. Additionally, in the interest of efficient and orderly proceedings, the Parties would like an opportunity, after Defendant files its responsive pleading to the Complaint, to meet and confer and prepare a Rule 26(f) report. *Id.*, ¶ 6.

7. Accordingly, the Parties agree to move the Court to extend the initial case deadlines and continue the Initial Case Management Conference by four weeks, as follows:

///

///

///

///

///

Event	Current Date	Proposed Date
Last day for Defendant to file a response to the Complaint	November 5, 2020	December 3, 2020
Last day to: <ul style="list-style-type: none"> <li>meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan; and</li> <li>file ADR Certification signed by Parties and Counsel</li> </ul>	November 27, 2020	December 24, 2020
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement	December 10, 2020	January 7, 2021
Initial Case Management Conference	December 17, 2020 at 11:00 AM	January 14, 2021 at 11:00 AM

8. The Parties respectfully submit that there is good cause for this request to modify the schedule, and that the request is not sought for the purpose of delay and will not cause prejudice in this matter. *Id.*, ¶ 7.

IT IS HEREBY STIPULATED AND AGREED by and between the Parties hereto, through their respective counsel, that they move the Court to extend the initial case deadlines and continue the Initial Case Management Conference by four weeks, as set forth above.

Dated: October 30, 2020

FAEGRE DRINKER BIDDLE & REATH LLP

By: /s/ Rita Mansuryan  
Rita Mansuryan

Attorneys for Defendant  
McDonald's Corporation

1 Dated: October 30, 2020

BORISON FIRM, LLC

2  
3 By: /s/ Scott C. Borison  
Scott C. Borison

4 Dated October 30, 2020

SHEEHAN & ASSOCIATES, P.C.

5 By: /s/ Spencer Sheehan  
6 Spencer Sheehan

7 Attorneys for Plaintiff  
Eugina Harris

8  
9 **[PROPOSED] ORDER**

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11 DATED: \_\_\_\_\_

12 \_\_\_\_\_  
13 Hon. Laurel Beeler  
United States Magistrate Judge